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July 22, 2021

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Richard S. Lawrence  
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State of Maine, DHHS  
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41 Anthony Avenue  
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**RE: Letter of Intent / Non-Applicability Request for Outpatient Imaging Center**

Dear Messrs. Carbonneau and Lawrence:

On behalf of our affiliate, Insight Health Corp. doing business as RAYUS Radiology, I am submitting this Letter of Intent / Non-Applicability Request ("NSTR") in connection with a proposed outpatient center for diagnostic imaging ("CDI") to be located in Auburn, Maine.

This filing follows the precedent of our filings in 2016 and 2017 in connection with our establishing a CDI in Brunswick, where Mr. Lawrence provided a Letter of Non-Applicability dated December 16, 2016. We provided updated information on December 18, 2017. Copies of these communications are attached for ease of reference.

We are asking our local counsel on this matter, John Doyle of the Preti Flaherty firm, to work with you once again in obtaining the regulatory clearances we need to proceed. John has helped us with this submission and will be in touch with you shortly to confirm your receipt of this filing and learn what further information you may need.

We are addressing below the key elements set forth in the CON Regulations, Ch. 6(1)(B) and (2)(4) applicable to letters of intent and non-applicability determinations.

The proposed CDI center will be located at 600 Turner Street in Auburn. It will carry out a range of diagnostic imaging services and procedures through utilization of diagnostic imaging equipment including MRI, CT, and other diagnostic imaging equipment.

We have attached a Financial Projection Document for the first three years of operation, setting forth the projected operating expenses among other elements. The Document also displays Capital Investment, including equipment and other capital investments.

The proposed CDI is not subject to Certificate of Need review for the following reasons:

- The overall capital expenditure of \$2,630,370 is below each of the following review thresholds (relying on the 2021 Threshold Chart on the DLRS website):
  - The \$3,000,000 threshold for new healthcare facilities set forth in Sec. 329(4-A)(B)(1);
  - The \$3,922,997 threshold for new health services set forth in Sec. 328(17-A); and
  - The \$3,858,310 threshold for major medical equipment set forth in Sec. 328(16)
- Likewise, the third year incremental annual operating costs of \$976,000, as these costs are defined in the CON Regulations, Chapter 3, Section 34, are below the \$1,307,666 threshold under Sec. 328(17-A)(B).

After we receive NSTR clearance to proceed with this project, we estimate that our work on leasehold improvements and equipment installation will begin in late August of 2021 and will be completed by the end of 2021.

Because the proposed CDI is not subject to review, we do not believe a technical assistance meeting is applicable or necessary. However, should you have questions or wish to meet with us to review this filing or review additional information, we would be most willing to meet with you at an early date.

Thank you for your attention to this request, and we look forward to working with you to obtain a Non-Applicability ruling and address and resolve all related regulatory issues. Mr. Doyle will be following up with you shortly.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Raymond", written in a cursive style.

Scott Raymond, Senior Vice President

SR/bh

Enclosure

cc: John P. Doyle, Jr.